

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

JOHN DOE,) CASE NO. 1:22-cv-11540-NMG
)
Plaintiff,)
v.)
MASSACHUSETTS INSTITUTE OF) JUDGE NATHANIEL M. GORTON
TECHNOLOGY,)
Defendants.)

ASSENTED-TO MOTION BY PLAINTIFF REQUESTING STATUS CONFERENCE

Plaintiff John Doe ("Plaintiff"), proceeding pro se, respectfully moves this Court to schedule a status conference in the above-captioned case. This request is pursuant to Federal Rule of Civil Procedure 16 , Local Rule 16.3 and the inherent authority of this Court to manage its cases effectively. The need for a status conference arises from recent developments in this case, notably the withdrawal of Plaintiff's counsel and Plaintiff's financial difficulties. In this conference the Court and the parties can resolve potential adjustments to the scheduling order, and other procedural matters that may facilitate the just, speedy, and inexpensive determination of this action.

BACKGROUND

1. **Recent Developments:** Plaintiff has recently filed a Motion to Amend Scheduling Order and Relief for Plaintiff (ECF No. 58), seeking a five-month extension of all scheduling

order deadlines due to several critical factors, including the withdrawal of Plaintiff's counsel, scheduling difficulties among the parties, the need to review extensive discovery material, the need to meet his financial obligations, and the need to complete his undergraduate education.

2. **Procedural and Case Management Issues:** The motion raises significant issues that warrant discussion and guidance from the Court, including adjustments to discovery deadlines, deposition schedules, and the potential impact on the trial date.
3. **Need for Judicial Guidance:** Given the complexities of the case and the Plaintiff's pro se status, a status conference would provide an invaluable opportunity for the Court to offer guidance, clarify expectations, and discuss the proposed amendments to the scheduling order.

ARGUMENT

A status conference is warranted under Federal Rule of Civil Procedure 16 and Local Rule 16.3 to ensure the just, speedy, and efficient resolution of this case. The conference would allow the Court to address the following:

1. **Scheduling Order Adjustments:** Discussion of Plaintiff's requested extensions and modifications to the scheduling order to accommodate the challenges outlined in ECF No. 58 and ECF No. 60.

2. **Pro-Se Representation Challenges:** Consideration of the unique challenges faced by Plaintiff as a pro se litigant, particularly in managing extensive discovery and preparing for trial.
3. **Plaintiff's Significant Financial, Professional and Educational Commitments:** Plaintiff's final academic term and substantial financial obligations necessitate immediate relief to prevent irreparable harm to his educational and financial future. Plaintiff has already started his final school term and his financial situation has deteriorated significantly since the filing of ECF. No 58. Plaintiff is struggling to afford to fly to Boston for an in-person deposition and to hire a required court stenographer to conduct his intended virtual depositions.
4. **Case Management and Efficiency:** Exploration of ways to streamline case management and maintain momentum towards resolution, while accommodating the Plaintiff's educational commitments and personal circumstances.

RELIEF REQUESTED

Plaintiff respectfully requests that the Court schedule a status conference at its earliest convenience to discuss the matters raised in Plaintiff's Motion to Amend Scheduling Order and Relief for Plaintiff (ECF No. 58) and any other issues the Court deems appropriate.

CONCLUSION

In light of Plaintiff's recent motion and the case's complexities, a status conference is essential to ensure fair and efficient proceedings for all involved. The conference would allow the Court to delve into the facts and legal arguments of ECF No. 58, providing a platform for Plaintiff to clarify the need for the requested changes and respond to any Court queries. This interaction is crucial for an informed decision, especially given Plaintiff's pro se status and the associated challenges. Plaintiff respectfully requests the Court to schedule a status conference Plaintiff is prepared to accommodate the Court's schedule to facilitate this request..

Dated: Jan. 26th, 2024

Respectfully submitted,

/s/ John Doe

doevmit11540@gmail.com

Local Rule 7.1 Certification

Plaintiff, *pro se*, conferred with counsel for Defendant MIT via email on January 26th 2024, regarding the relief requested in this motion. Counsel for Defendant has indicated via email, shortly after this virtual call, that MIT assents to the above motion.

CERTIFICATE OF SERVICE

I , John Doe, certify that on this 26th day of January 2024, a true and correct copy of the foregoing was filed through certified mail, which will be sent to the Defendant ,this court and any non-registered participant.

Dated: January 26th 2024

Respectfully submitted,

/s/ John Doe

doevmit11540@gmail.com